

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|---|---|----------------------------------|
| IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION |) | |
| |) | |
| |) | |
| This document relates to: |) | |
| |) | |
| <i>The County of Summit, Ohio, et al. v. Purdue</i> |) | |
| <i>Pharma L.P., et al.</i> |) | |
| Case No. 18-op-45090 |) | |
| |) | MDL No. 2804 |
| and |) | Case No. 17-md-2804 |
| |) | Hon. Judge Dan A. Polster |
| <i>The County of Cuyahoga v. Purdue Pharma</i> |) | |
| <i>L.P., et al.</i> |) | |
| Case No. 1:18-op-45004 |) | |
| |) | |

CERTAIN DEFENDANTS' AFFIRMATIVE DEPOSITION DESIGNATIONS

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in In re National Prescription Opiate Litigation (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), as well as agreement among the parties, Certain Defendants¹ submit the following Affirmative Deposition Designations from the Deposition Transcript of Kyle Wright in the *United States v. \$463,497.72*.

The Designating Defendants further notify the Court that this deposition transcript will be read into the record, due to the absence of an available deposition video.

The Designating Defendants reserve all rights, including all rights to revise or withdraw designations. The Designating Defendants further reserve the right to revise or withdraw these

¹ The Defendants are AmerisourceBergen Drug Corp., Cardinal Health, Inc., McKesson Corporation, Walgreen Co., and Henry Schein, Inc.

designations based on the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial.

The Designating Defendants also reserve the right to play, in response to deposition testimony played by Plaintiffs or other individual Defendants, any testimony Plaintiffs or other Defendants have designated. By submitting these designations, Defendants do not waive any objections to the use of testimony and/or exhibits or their subject matter. Defendants' inclusion of any testimony and/or exhibits within these designations should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another Defendant.

Dated: October 10, 2019

Respectfully Submitted,

/s/ Shannon E. McClure

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CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart